

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PURELAND PICTURES, INC.

Plaintiff,

v.

MEHRET MANDEFRO,

Defendant.  
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07 CV 10448 (LAP)

**NOTICE OF MOTION  
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE THAT, upon the pleadings and papers in this matter, the Declaration of Darren W. Johnson, dated April 7, 2008, and the exhibits attached thereto, Plaintiff's Local Rule 56.1 Statement of Undisputed Facts in Support of Its Motion for Summary Judgment, dated April 7, 2008, and the accompanying Memorandum of Law, Plaintiff Pureland Pictures Inc. will move this Court before the Honorable Loretta A. Preska, at a date and time to be determined by the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting Plaintiff's motion for summary judgment, dismissing Defendant Mehret Mandefro's counterclaims and entering judgment in favor of Plaintiff.

Oral argument is requested.

The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: New York, New York  
April 7, 2008

Respectfully submitted,

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP

By: /s/ Darren W. Johnson

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